



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

November 10, 2020

**By ECF**

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Tagliaferro, et al.*, 19 Cr. 472 (PAC)**

Dear Judge Crotty:

Pursuant to the Court's direction at the pretrial conference held on November 9, 2020, the parties jointly propose the following schedule for pretrial submissions:

- Motions *in limine* due December 28, 2020;
- Opposition to filed motions due January 4, 2021;
- Replies, if any, due January 7, 2021; and
- Proposed Requests to Charge and Proposed Voir Dire due January 7, 2021.

In addition, the Government respectfully requests that the Court exclude time through the current trial date of January 18, 2021, pursuant to 18 U.S.C. § 3161(h)(7)(A), in light of the ongoing public health crisis and its effect on the parties' ability to prepare for trial. The defendant consents to this request.

Respectfully submitted,

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Southern District of New York

By: /s/  
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cc: Counsel of Record (via ECF)